

# **EXHIBIT 5**

Message

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**From:** GREGORY WACKER [/O=TEMPLE UNIVERSITY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GWACKER]  
**Sent:** 10/29/2010 10:02:49 AM  
**To:** DEIRDRE L CULBREATH-WALTON [DLWalton@temple.edu]  
**Subject:** FW: I need advice

Deirdre,

I will call you later today to discuss.

Thanks.

Greg

**From:** Ruth V. Briggs [mailto:rbriggs@temple.edu]  
**Sent:** Friday, October 29, 2010 9:10 AM  
**To:** GREGORY WACKER  
**Subject:** I need advice

Greg,

I cannot come in here day in and day out, not knowing if I am going to be applauded or punched. It is stressful to me and everyone around me. If I wanted change jobs at Temple, it would be impossible because of him.

Frankly, it borders on harassment. Right now he is in his office yelling in Chinese at one of his students. The he starts complaining to Justin in Chinese about the dean's office. The environment is hostile. Even faculty members have told me that they are uncomfortable about the way he treats me.

Ruth

# **EXHIBIT 6**

Message

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**From:** jiewu13@gmail.com [jiewu13@gmail.com]  
**Sent:** 11/9/2010 7:30:09 AM  
**To:** Ruth V. Briggs [rbriggs@temple.edu]; JIE WU [jiewu@temple.edu]  
**CC:** Alexandra Grinshpun [alexg@temple.edu]  
**Subject:** Re: Issues related to proofread

Ruth, for Li's paper (assigned last Fri) please send me your proof (acrobat) on Thursday after you complete the proof of CIS booklet on Wed. Please note that the submission deadline is Fri. I really need it by Thur. Thanks again for your help.  
Jie Wu

Sent via BlackBerry from T-Mobile

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**From:** "Ruth V. Briggs" <rbriggs@temple.edu>  
**Date:** Tue, 9 Nov 2010 05:17:29 -0500  
**To:** JIE WU<jiewu@temple.edu>  
**Cc:** Alexandra Grinshpun<alexg@temple.edu>  
**Subject:** Re: Issues related to proofread

Dr. Wu,

Please note that it is nearly 4:30 am.♦ Attached you will find three versions of the responses to the reviewers' questions.♦ While I am certain that you will believe me to be incompetent, both of the publisher proofs on which I worked diligently throughout the evening and night were in pdf format.♦ I used acrobat professional for my edits.♦ I encountered no problems with the reviewer's document.♦ The first save I attempted on Li's proof, I got an error message, so I tried to print it so that I would not lose my work.♦ I got a similar error message with a different code.♦ Pulled out all the tricks I could remember and when I was so filled with anxiety that I could not breath, the application crashed, then the computer crashed.♦ Rebooted to find two documents (proofs) with none of my comments.♦ I did a "save as" for the reviewer's doc earlier, but it was too much on a night when I was exhausted from a stressful week of work in one day and one more admonishing email from you to expect a disciplinary action upon your return.♦ It is really difficult to be in battle.♦ While I have no defense against anything that comes my way, it would be nice to have fairness in treatment and equal applying standards applied for staff members.♦

So I will wait for my disciplinary action.♦ Because it doesn't matter that I am the only one who will stay here for you past work hours or work on the weekends for you...♦ When something goes wrong in this department, it makes sense to blame it on someone who is working because if you are not working, mistakes are less likely to happen.♦ I have heard♦ that other department staff and faculty use my name in vain also.♦♦

Let me know if you want me to do hand written comments on Li's proof and see if I can find a scanned to send to you.♦

Have a great trip.

On Mon, Nov 8, 2010 at 11:35 PM, JIE WU <jiewu@temple.edu> wrote:

Ruth,

I would like to put this in our record that you never gave me back the paper proof given to you last Friday. I was told today that you have done that, but left at home. So far, I have not received anything from you nor with the 6 page proofread of another document that I gave you today.

I want to make sure that all these should not be any reason for possible delay of your Tuesday and Wednesday assignment, i.e. to complete the proofread of CIS department booklet that we have agreed last week.

--

Jie Wu, Ph.D  
Professor and Chairman, Fellow of the IEEE  
Computer and Information Sciences  
Temple University  
Tel: 215-204-8450, Fax: 215-204-5082  
Email: [jiewu@temple.edu](mailto:jiewu@temple.edu)

# **EXHIBIT 7**

Message

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**From:** RALPH E. JENKINS [/O=TEMPLE UNIVERSITY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=RJENKINS]  
**Sent:** 11/19/2010 1:16:44 PM  
**To:** GREGORY WACKER [gwacker@temple.edu]  
**Subject:** FW: A revised letter  
**Attachments:** Ruth Briggs letter from Chair.doc

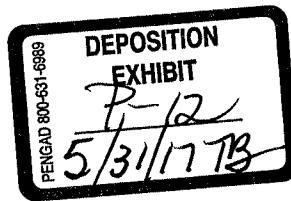
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Ralph E. Jenkins  
Senior Associate Dean  
College of Science and Technology  
Suite 400 Carnell Hall  
Temple University, Philadelphia, PA 19122  
Phone: 215-204-8176

-----Original Message-----  
**From:** JIE WU [mailto:jiewu@temple.edu]  
**Sent:** Wednesday, November 17, 2010 11:40 AM  
**To:** RALPH E. JENKINS  
**Subject:** A revised letter

Ralph,

FYI.

--  
Jie Wu, Ph.D  
Professor and Chairman, Fellow of the IEEE  
Computer and Information Sciences  
Temple University  
Tel: 215-204-8450, Fax: 215-204-5082  
Email: jiewu@temple.edu



Dear Human Resource Officer:

I am writing to request your assistance regarding Ms. Ruth Briggs in the CIS Department, College of Science and Technology.

Ruth's official position is Executive Assistant to the Chair of CIS Department and Assistant to the Director of the Information Science and Technology Center.

For the last two years, we have been very frustrated working with Ruth.

Ruth is a well-meaning person. She has a strong sense of doing jobs well. However, she has insisted on interpreting instructions her own way without asking for clarification before execution. She also has her own sense of priority, rather than what we specify. This has caused much frustration to both myself, the IST Director, Dr. Zoran Obradovic, and many faculty in department.

Here are some examples during last week of our "Ruth Problems":

- a) A faculty member is being considered for promotion and tenure. The Department has organized a committee to evaluate his performance, publications and collected external reviews. I gave her instructions to "assemble all files and submit them electronically to the Dean's office". Instead of following the instructions and submitting the files on time, she sent out an email to multiple faculty alerting them that one letter in the package did not follow the required format. It turned out she forgot to include my latest revision. This caused not only great confusion, but a significant delay in meeting the deadline.
- b) An NSF senior Director is scheduled to visit. I requested Ruth to help inform the Temple Times to advertise this event on the University Calendar. In the email to the Temple Times, the Director's name was mentioned using her nickname. The event was publically listed with the Director's nickname and without her NSF affiliation or position information. This resulted in an incomplete announcement that would result in this important visit being overlooked by faculty and others interested.
- c) For the same NSF Director's visit, I asked Ruth to arrange and schedule meetings with faculty and students and the visitor. Ruth has made repeated mistakes in the names of the Director and faculty, even after multiple revisions. Again, this has led to confusion and much and much unnecessary communication.
- d) A Chinese delegation came to visit our Department for a half-day. All time slots for their visit were completely scheduled. Ruth called the Dean of the College of Engineering to arrange for an afternoon presentation and meeting with the delegation. She thought the delegation would be delighted if they could meet more people at Temple. She made the call without discussing such a meeting with me and the delegation. This was embarrassing and led to confusion as the delegation was leaving at mid-day.
- e) A faculty member's promotion and tenure requires contacting external reviewers for their participation in the review process. Ruth had been asked to contact prospective reviewers on a specific list to determine their availability. Ruth could not remember whom she called and whom she did not. A few external professors complained that they had received repetitive

requests for external reviews, and they had declined to participate a long time ago. This was embarrassing to me and the department, and again led to confusion when following up for review materials.

- f) I have also asked Ruth to help proof-read our new Department brochure. Last week before leaving for travel, I requested that Ruth give this her highest priority and for two days not to work on anything else. Only a small portion of the work is complete, and still with multiple mistakes.

There are many similar incidents that demonstrate her inability to follow instructions and work with efficiency and accuracy. As an assistant to me and other members of our management team, she must be involved in some high profile events concerning the Department's and Temple's image to the outside world. Some of the mis-handled events have already caused a negative impact on Temple's image. I am very concerned about the long term impact of this situation.

I am asking for your assistance in finding a replacement for her position.

Many thanks!

Jie Wu

Professor and Chair  
CIS Department

# **EXHIBIT 8**

Message

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**From:** SHARON I BOYLE [/O=TEMPLE UNIVERSITY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SHBOYLE]  
**Sent:** 12/9/2010 9:24:09 AM  
**To:** JIE WU [jiewu@temple.edu]; GREGORY WACKER [gwacker@temple.edu]; RALPH E. JENKINS [rjenkins@temple.edu]  
**CC:** MONICA J. WASHINGTON [MonicaW@temple.edu]; DEIRDRE L CULBREATH-WALTON [DLWalton@temple.edu]  
**Subject:** Ruth Briggs

Dear Dr. Wu-

I am writing to follow up on our meeting regarding the performance with Ruth Briggs.

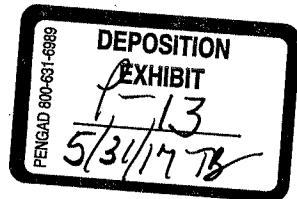
Following our meeting, I met with Ruth Briggs.

Based on the discussions and information received in both meetings, there is no basis for disciplining Ruth at this time.

My recommendation is to continue to assign tasks to Ruth through email with cc to Alex and alert Alex to any Problems as soon as they become evident.

As stated, Monica Washington, Deirdre Walton and I are always available for consultation as issues arise.

Sharon Boyle



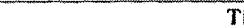
# **EXHIBIT 9**

**PLEASE PRINT WHERE POSSIBLE AND PRESS HARD IF WRITING.**



Temple University

## Disciplinary Report

Department	Computer and Information Sciences	Date	11/09/2011
Employee's Name	Ruth Briggs	Title	Executive Assistant
TUid	908672981		
Immediate Supervisor	Jie Wu	Title	Chair

Check disciplinary action taken. If prior disciplinary action had been given in the same category of the work rule violation, indicate the date(s) action was taken.

General Counseling <input type="checkbox"/>	Final Written Warning <input type="checkbox"/>
Date(s) of Action:	Date(s) of Action:
Verbal Counseling <input type="checkbox"/>	3 Day Suspension w/o Pay <input type="checkbox"/>
Date(s) of Action:	Date(s) of Action:
Written Warning <input checked="" type="checkbox"/>	Termination <input type="checkbox"/>
Date(s) of Action: 11/09/2011	Date(s) of Action:

**Explanation (Use reverse side if needed):**

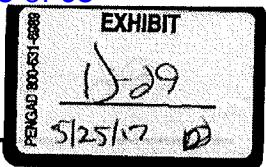
Violation of Rule B.11 Unprofessional/Inappropriate Conduct

Employee's Signature (SIGNING INDICATES RECEIPT ONLY!)		Date
		11/11/2011
PRINT Name (Organization/Delegate) (needed only if Bargaining Unit position)	Organization/Delegate Signature (sign only if Bargaining Unit member)	11/11/2011
		11/11/2011
PRINT Name (Department Head or Designee)	Department Head or Designee Signature	11/11/2011
		11/11/2011

**Distribution:** Original to: Employee Copies to: Supervisor, Human Resources/Labor Relations\*, Union (if union employee)  
\* Only disciplines at the level of written warning or above must be sent to Human Resources and Labor Relations.

Revised 07/25/2011

# **EXHIBIT 10**



## Message

**From:** Ruth V. Briggs [rbriggs@temple.edu]  
**Sent:** 8/2/2012 6:20:30 PM  
**To:** Sandra A. Foehl [sfoehl@temple.edu]  
**Subject:** Re: Scheduling a meeting with you

Dear Sandy,

Thank you for meeting with me on Monday, July 30th to discuss several issues regarding my employment with the university. If it is possible to review the letter to Michael Klein before sending, please let me know.

If not, I would appreciate a synopsis of the content presented in the "complaint," so that I will be prepared for my return to work after my son's surgery. I am not having "buyers' remorse" but I am nervous about the manner with which I will be treated when I return after my son's surgery.

I will be out of the office tomorrow, Friday, September 3rd, but will check my email.

Thank you so much for your help. I am greatly appreciative of your guidance.

Best regards,

Ruth

*Ruth V. Briggs  
 Executive Assistant  
 Department of Computer and Information Science  
 College of Science and Technology  
 Temple University Wachman Hall, 3rd Floor  
 1805 N. Broad Street (038-24)  
 Philadelphia, PA 19122  
 215-204-8659 - Direct line  
 215-204-8450 Department line*

On Mon, Jul 30, 2012 at 8:35 AM, Sandra A. Foehl <[sfoehl@temple.edu](mailto:sfoehl@temple.edu)> wrote:

Ruth, if 11:30 good? If not suggest another time. Sandy

**From:** Ruth V. Briggs [mailto:[rbriggs@temple.edu](mailto:rbriggs@temple.edu)]  
**Sent:** Sunday, July 29, 2012 12:50 PM  
**To:** Sandra A. Foehl  
**Cc:** Rhonda L Brown  
**Subject:** Scheduling a meeting with you

Dear Sandy,

Thank you for responding to my email. My boss is traveling for the next two weeks, allowing me flexibility. I can meet Monday anytime. I start at 8:30 am. The same is true for any day throughout the week.

I am located in Wachman and can get to your office quickly.

Thank you,

Ruth

*Ruth V. Briggs*

*Executive Assistant*

*Department of Computer and Information Science*

*College of Science and Technology*

*Temple University Wachman Hall, 3rd Floor*

*1805 N. Broad Street (038-24)*

*Philadelphia, PA 19122*

*215-204-8659 - Direct line*

*215-204-8450 Department line*

On Thu, Jul 26, 2012 at 11:53 AM, Sandra A. Foehl <[SFoehl@temple.edu](mailto:SFoehl@temple.edu)> wrote:

Ruth, in the two weeks beginning July 30 I have time every day except Tuesday the 31st in the afternoon and Wednesday the 1st in the morning. Please suggest a time convenient for you. Sandy

-----Original Message-----

From: Ruth V. Briggs [mailto:[rbriggs@temple.edu](mailto:rbriggs@temple.edu)]

Sent: Wednesday, July 25, 2012 9:05 PM

To: [sandra.foehl@temple.edu](mailto:sandra.foehl@temple.edu)

Cc: Rhonda L Brown

Subject: Request to meet with you

Dear Sandy,

I spoke to Rhonda Brown regarding personal employment issues, about which I was encouraged to meet with you. Please let me know if you have availability to meet during the two weeks that begin next Monday, July 30th.

Best regards, Ruth

Ruth V. Briggs (cell phone-484-557-6234) Executive Assistant Department of Computer and Information Science College of Science and Technology Temple University Wachman Hall, 3rd Floor  
1805 N. Broad Street (038-24)  
Philadelphia, PA 19122  
215-204-8659 - Direct line  
215-204-8450 Department line

# **EXHIBIT 11**

Mtg requested by Ruth Briggs

7/30/2012

Ms. Briggs has been in the Dept of Computer Information Sciences for the past 3 yrs since Sept 2009 working with the Dept Ch. Dr. Ku

George Palladino arranged the temporary placement, "on loan" from the Dean's Office  
Greg Whacker has history of arrangement.

### Problems

Dr. Ku yells and says demeaning things, e.g. "Are you stupid?" "In China women your age are done."

Ms. Briggs gives Dr. Ku the benefit of the doubt for his remarks, allowing for cultural differences and difficulty with English.

### Write up for nonbordination

Dept Secy Judy Leonard is a 30 yr employee but not adept with technology

Dr. Ku's instructions to Ms. Briggs: "Don't help her" "Send her to Dean's Office"

Greg Whacker adds, "I'll discipline you if you help her."

Ms. Briggs' position - Of course I'm going to help her.

Dr. Ku gives my work to student workers

e.g. Mary Beth goes to the hotel with Dr. Ku to meet the conference planners

### Salary

My salary level is T26 but I'm paid at a lower rate than technical T26

My position is non-bargaining unit - no recourse through union.

Current job description is Executive Assistant as in Dean's Office

I believe I'm still paid from dean's office cost center.

Performance evaluation? PDP in 2012 of 1.5, + previous PDPs 2011, 2010

Based on undefined various functions and Dr. Ku's comments

(over)

Remedy? Ms. Briggs wants to return to her initial job duties: editing papers, editing web content, supervising - I oversaw front office operations. Clear PDP. Functions defined. Salary commensurate with job + years in service. File age discrimination complaint?

I'm scared.

I'd like to get away from Greg Whacker. I feel he's retaliating because of what happened with Tammy Hunnewell complaint + my testimony as if Greg is thinking "they mixed with the wrong person + I'll find a way to take them down."

And I'm taking time in August for which I've requested FMLA (post-operative care of son).

Salary - PDP concerns to HR? Human Resources hasn't been helpful. Ask advice of new Interim Dean Michael Klein? Ms. Briggs said she hasn't done so but I may do it on her behalf.]

ef

8/3/2012 Phone conversation with Eric Brunner, H.R. Training & Development  
on re Ruth Briggs

Some performance criticisms were made in previous PDP's

She never had a 3.0 rating

Mr. Brunner's recommendation to Ms. Briggs was to have a conversation  
with her supervisor. Clarify with him what he expects in her work.

# **EXHIBIT 12**

Message

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**From:** Sandra A. Foehl [SFoehl@temple.edu]  
**Sent:** 8/3/2012 9:38:12 AM  
**To:** Deirdre L Culbreath-Walton [DLWalton@temple.edu]; Eric Brunner [EBrun@temple.edu]  
**Subject:** Employee complaint

Deirdre and Eric,

Do either of you have some history with Ruth Briggs in the College of Science and Technology, especially since her assignment to the Department of Computer Information Sciences? If so, will you share?

Sandy

# **EXHIBIT 13**

From: Ruth V. Briggs rbriggs@temple.edu  
 Subject: Fwd: Confidential  
 Date: September 9, 2012 at 7:16 PM  
 To: RHONDA L BROWN rlbrown@temple.edu



Dear Rhonda,

*I regret having seen Sandy Foehl because I could not see the original complaint, nor have I heard if it was filed nor how it will be addressed.*

*I am over my head now taking care of an invalid 24 year old and don't want to have the threat of joblessness in the face of this crisis.*

*Sorry that I do not have time to write more about the complaints that I wished to be researched. My son needs me now.*

Ruth

----- Forwarded message -----

From: Ruth V. Briggs <rbriggs@temple.edu>  
 Date: Sun, Sep 9, 2012 at 7:08 PM  
 Subject: Confidential  
 To: "Sandra A. Foehl" <sfoehl@temple.edu>

Dear Sandy,

I am uncertain about the status of the complaint, about which we spoke regarding my job description, my performance development plan and adjusting my salary to the 2011 maximum salary level new hire range for a T26. I did receive a 1.75% salary increase and a one time \$1,000 bonus, but I heard that other non-bargaining staff members also received a small salary increase. My earnings for 2011 was \$51,651.12. With the increase, my salary will be \$51,525, which is \$2075.00 less than the maximum salary permitted for a new hire.

**T-scale salaries for 2011-T26**

Minimum	25%tile(Max for new hire)	Target / Mid	Control Pt 75% tile	Maximum T26
\$42,300	\$53,600	\$60,500	\$71,200	\$80,900

The position I held before I came to Temple was Assistant Director of Foundation Relations at the Academy of Natural Sciences, the position I held before that was Director of Development the PA Home of the Sparrow and the Prison Society. I have a BA in history and political science and I am 12 credits short of a masters in counseling psychology.

Dr. Wu knows that I have years of experience in grant writing, scientific publishing, event planning, but he is giving these functions to one of our student workers, as well as a private office. My primary functions are those of our department secretary, Judy Lennon, the department secretary is limited to tasks that can be completed on a typewriter and a copy machine because she was allowed to perform her job using decade old office technology. Her computer literacy is extremely limited because there was no one in department leadership directly mentoring her through her PDP to attend computer training classes offered by the university. Before I was moved to CIS, this was a problem identified by Greg Wacker in the CST Dean's Office. I was told not to help her with any of her work so that her lack of skills could be documented as poor job performance. In fact, Greg threatened me with a disciplinary report for insubordination if he found out that I was helping her on the computer. He told me to refuse to help her and send her to the Dean's Office so that he could have just reason to let her go. I told him that I would not "throw the widow with cancer" under the bus because I have no supervisory role over her. If his goal was to document her inefficiency in order to fire her, he would also have to catch me helping her because I believe her inefficiency is a symptom of poor leadership.

The reason for reporting this to you is unrelated to Judy's performance but relevant to bullying tactics from a man who has threatened me with dismissal for lack of loyalty to him. As a single mother of four children he knew that I was afraid that he was in a position to fire me. I do know that I was paid significantly lower than two male staff members in the Dean's office who were my equals.

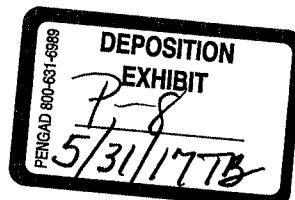
Regarding our discussion related to Dr. Wu's comments about my age, I am forwarding an email that was sent to a student worker in our office about yet another of my job functions assigned to her. I was copied on the email, as you can see in the email header, as was Michele Mascucci, an associate director in the sponsored research department, which is shaming and embarrassing for me. Additionally, last week, I was informed in front of Mary Kate that she would be handling all his travel arrangements, too.

I am not authorizing any action on my part because I am waiting to be cleared for FMLA for a short period to care for my son who has a spinal cord injury.

Please let me know what and when to expect my original complaints to be addressed.

Sincerely,  
 Ruth

Ruth V. Briggs  
 Executive Assistant



# **EXHIBIT 14**

Message

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**From:** Sandra A. Foehl [/O=TEMPLE UNIVERSITY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SFOEHL]  
**Sent:** 11/5/2012 3:03:12 PM  
**To:** Ruth V. Briggs [rbriggs@temple.edu]  
**Subject:** RE: My request for job description and salary adjustment  
**Attachments:** agency list\_eoc.doc

Ruth V. Briggs  
Executive Assistant  
Department of Computer and Information Science  
College of Science and Technology  
Temple University

Dear Ruth,

Did I misread the line in your previous e-mail? You wrote on September 9, 2012, "I am not authorizing any action on my part because I am waiting to be cleared for FMLA..." If you are now authorizing action, will you please respond to my request of August 30, 2012, for a written statement setting out the particular instances of bullying, threats of dismissal, and expressions of age bias by Dr. Wu and/or Mr. Wacker. The e-mail from Dr. Wu, forwarded by you on September 9, 2012, is not discriminatory on its face and so does not answer my request.

Your concern that you are not correctly compensated for the work you do may be addressed by you to your dean or to Human Resources without a finding of discrimination by this office. If, however, it is your position that because of age or race or gender discrimination you are paid less than similarly situated others, please make a direct comparison. Who is paid more than you for the same work?

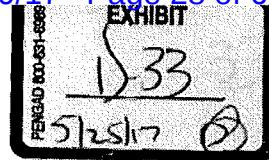
Please be advised that complaints of unlawful discrimination may be made to government compliance agencies as well as to this office. The attachment here gives direction to the federal, state and municipal offices in Philadelphia.

Sincerely yours,

Sandra

Sandra Foehl  
Director, Equal Opportunity Compliance  
Temple University  
(215) 204-6772

# **EXHIBIT 15**



5/23/14, 7:20 AM

Temple University Mail - Re:



RE: 16-cv-00248-RK - rbriggs@temple.edu

**Re:**

16-cv-00248-RK

Rhonda L Brown <rlnbrown@temple.edu>  
 To: "Ruth V. Briggs" <rbriggs@temple.edu>

Fri, Feb 8, 2013 at 7:49 AM

Go to sandy

Sent from my iPhone

On Feb 7, 2013, at 11:54 PM, "Ruth V. Briggs" <rbriggs@temple.edu> wrote:

Rhonda,

I am so bullied and harassed all day. Two people in the dean's office tell me that I can find another job. That can't be right.

Ruth

*Executive Assistant  
 Department of Computer and Information Science  
 College of Science and Technology  
 Temple University Wachman Hall, 3rd Floor  
 1805 N. Broad Street (038-24)  
 Philadelphia, PA 19122  
 215-204-8659 - Direct line  
 215-204-8450 Department line*

# **EXHIBIT 16**

Message

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**From:** Sandra A. Foehl [SFoehl@temple.edu]  
**Sent:** 2/8/2013 9:09:45 AM  
**To:** Deirdre L Culbreath-Walton [DLWalton@temple.edu]  
**CC:** Tracey Hamilton [Hamiltot@temple.edu]  
**Subject:** FW: Urgent

Deirdre, I don't see a claim of unlawful discrimination/harassment in Ruth Briggs' message. It appears to be a matter of performance development/correction for Human Resources' review. Please let me or Tracey know if a complaint for EOC is raised with you. Sandy

**From:** Sandra A. Foehl  
**Sent:** Friday, February 08, 2013 9:03 AM  
**To:** Ruth V. Briggs  
**Subject:** RE: Urgent

Ruth Briggs  
Department of Computer and Information Science  
College of Science and Technology  
Temple University

Ruth, this is an issue for Human Resources first. Address the situation and your concerns to Deirdre Walton in Labor and Employee Relations. Sandy

Sandra A. Foehl  
Office of Equal Opportunity Compliance  
Temple University  
(215) 204-6772

**From:** Ruth V. Briggs [mailto:[rbriggs@temple.edu](mailto:rbriggs@temple.edu)]  
**Sent:** Friday, February 08, 2013 8:26 AM  
**To:** Sandra A. Foehl  
**Subject:** Urgent

Sandy,

I am so bullied and harassed all day. Everyday morning, I must meet with, my direct supervisor and Greg Wachker's assistant, Drew DiMeo for "staff meeting" to discuss my failure to comply with a directive that prohibits any work activity that has not been approved by my supervisor, all of which are related to performing daily functions in the office...such as answering questions from students or visitors to our building. The threat of discipline for assisting a visitor or

responding to a request from another office does not seem to have any actions of wrong doing, rather fulfilling a "customer service" expectation for the university. No other staff member is required to meet daily for a dose of public humiliation and my request to move the meetings to a private location was flat out denied.

When I asked for clarification on an assignment, it is reported to the dean's office as a challenge to his authority. If he can have a someone there to protect his interests, there is more than an element of unfairness. It is beginning to feel like psychological abuse.

If my only resource to address this problem is through HR, this is unacceptable. Can I contact a mediator?

Ruth

*Ruth V. Briggs  
Executive Assistant  
Department of Computer and Information Science  
College of Science and Technology  
Temple University Wachman Hall, 3rd Floor  
1805 N. Broad Street (038-24)  
Philadelphia, PA 19122  
215-204-8659 - Direct line  
215-204-8450 Department line*

# **EXHIBIT 17**



Ruth V. Briggs &lt;rbriggs@temple.edu&gt;

## Re: Confidential Communication

1 message

Ruth V. Briggs <rbriggs@temple.edu>  
To: Cameron Etezady <etezady@temple.edu>

Thu, Aug 8, 2013 at 8:34 AM

Dear Cameron,

Yes, you can have Fay provide the background I have shared with you and have her contact me.

Thank you very much.

Ruth  
Ruth V. Briggs  
Department of Computer and Information Science  
Temple University  
215-204-8659 - Direct line  
215-204-8450 Department line

On Tue, Aug 6, 2013 at 6:25 PM, Cameron Etezady <etezady@temple.edu> wrote:

> Dear Ruth,  
>  
> Thank you for your kind words about me regarding our interactions in 2008.  
>  
> I am sorry to hear about your disciplinary issues. I am unfamiliar with them.  
>  
> I wasn't quite clear about your interactions with Deirdre. Have you been able to work with her since April?  
>  
> As you have worked with Fay in the past and spoken to her once before on this topic, I would direct you to her as she generally handles employment matters such as this. If you like, I can have Fay reach out to you with or without the background you have provided.  
>  
> Sincerely,  
> Cameron  
>  
> -----Original Message-----  
> From: Ruth V. Briggs [mailto:rbriggs@temple.edu]  
> Sent: Tuesday, August 06, 2013 11:45 AM  
> To: Cameron Etezady  
> Subject: Fwd: Confidential Communication  
>  
> Dear Cameron,  
>  
> I am forwarding the email that I sent in February of this year to refresh your memory regarding my reason for reaching out to you about my situation. I did contact Faye Trachenberg, as suggested and she referred me to Deidre Walton. I did reach out to her and asked her if she would agree to meet with Dr. Wu, Andrew DiMeo and me to serve in as a mediator-like role at one of our daily morning meetings followed by a private meeting for her to offer feedback and suggestions for leveling the playing field to establish some sense of fair play in the work day that commences in a

15-30 minute competition between a team with two men and me.

>

> I did not hear from her after our initial conversation until I made contact with her in April when I returned from a 3 day suspension without pay. I do not want to write a long email defending myself for a mistake for which I pointed out to my supervisor, to Andrew Dimeo and Eugene Kwatny as soon as it was discovered. I fully expected that I would receive a verbal warning. You can imagine my surprise when I received a Level C discipline for "Neglecting job duties or responsibilities, or failing to carry out instructions given by supervision." I was asked to sign the disciplinary action form but was not allowed to read the letter in which the allegations against me were presented by the department's associate chair, Eugene Kwatny. I responded respectfully, signed the form and made a request to Dr. Wu and Andrew DiMed that this incident remain confidential to my co-workers, students and student workers, for which they responded that the incident would be handled professionally and privately. I returned on Monday and learned from co-workers, students and student workers that it was discussed in the front office, one person heard about it on the elevator and another heard Dr. Wu talking about the situation when she was waiting to pick something up from the dean's office.

>

> This was a great concern to me and I submitted a request to review my employee file to read the "confidential" letter that I was not allowed to read, which led to my harsh punishment. To my chagrin, the allegations against me were exaggerated and the state of the office at that time were omitted. Sharlita Brown in HR was with me when I reviewed the letter. I shared my hopelessness with her and she encouraged me to call Deidre about the situation. I told her that I had asked for her help in February and her failure to respond did not instill me with a sense of confidence in her. But I did decide to reach out again. We did meet the week I returned. While I was told that there was nothing I had no recourse to have the harsh disciplinary action overturned for a lighter "sentence," she would allow me to bid on jobs internally. I was told to send an email to her if I was interested in a position and she would contact the HR generalist to lift the hold. Since April, I sent three requests by email to bid on positions that I found but she never responded.

>

> I have very strong personal beliefs regarding our litigious society and feel a moral obligation to find solutions to problems in a manner that is not adversarial. **BUT NO ONE WILL RESPOND TO ME AND MY PROFESSIONAL LIFE IS ON THE LINE.**

>

> The first time you met with me about Tanya Hunnewell, I explained that I did not want to provide a statement because I was afraid of retaliation. I wish I could offer concrete evidence to support my feeling that this may still be affecting my reputation but I cannot.

> My situation I believe is now compounded because of my age, my gender and perhaps ethnicity. I am begging for someone within Temple to help me mediate this problem. I am reaching out to you because I did believe that you were sincere in our meeting about Tanya, as well as, sensitive and trustworthy.

>

> My confidence has never been so low and at 58 years old, I have not options to change the course of my plummeting professional life because I am relegated to making coffee, secretarial functions even though I have never been a secretary. Young female student workers occupy my former office area where they carry out my job functions while I was re-located from the third floor of Wachman to the 10th floor of Carnell. Even though the 2 vs 1 meetings continue every morning in the main office and I am summoned to come down when Dr. Wu has guests who want coffee, I am so far removed from the CIS Department to appear as if I was banished from the department where I am told by well-intentioned faculty who want to remain anonymous and students that I am a scapegoat for the department.

>

> I have written far more than I intended and I will end this message with an appeal to you to help me navigate in the dark to maintain the most important thing to me...my integrity.

>

> Sincerely,

> Ruth

> Ruth V. Briggs

> Department of Computer and Information Science Temple University

> 215-204-8659 - Direct line

> 215-204-8450 Department line

>

>

>  
 >  
 > ----- Forwarded message -----  
 > From: Cameron Etezady <etezady@temple.edu>  
 > Date: Mon, Feb 11, 2013 at 9:09 AM  
 > Subject: Re: Confidential Communication  
 > To: "Ruth V. Briggs" <rbriggs@temple.edu>  
 >  
 >  
 > Dear Ruth,  
 >  
 > Please call me Cameron.  
 >  
 > I apologize for doing this by email, but as I said, I am working out of the office most of this week. I was unclear about your email. Are you uncomfortable with Sandy, Tracey, and Deirdre? Any of the three would be able to accomplish a mediation that you requested.  
 >  
 > I can also refer you to Fay Trachtenberg in my office who could provide you with more prompt attention and discuss the options with you. If none of those options are acceptable, let's set up a meeting for next week to talk things through.  
 >  
 > Cameron  
 > Office: 215-204-6542  
 >  
 > Sent from my iPhone.  
 >  
 > On Feb 10, 2013, at 10:32 PM, "Ruth V. Briggs" <rbriggs@temple.edu> wrote:  
 >  
 >  
 > Dear Mr. Etezady,  
 >  
 > I appreciate your prompt response and thank you for taking your time to reply over the weekend.  
 >  
 > After a week of unrelenting bullying, I sent an email to Rhonda Brown and she told me to contact Sandy, Sandy told me to contact Deidre Walton. Since I provided a statement several years ago for a discrimination lawsuit by Tanya Hunnewell, in which I contradicted the story that I was coached to report, I do not trust that she has my best interests at heart.  
 >  
 > On numerous occasions, Jie Wu has mentioned that the professional lives of women my age (58) in China are over and I wrote it off to cultural differences. It was when he would make a comment that referenced my age and failure to attain the financial stability to be able to travel when I felt defensive and offended. I did not want to make an issue about it, but I told him privately that I was embarrassed when he insinuated that I was a poor manager of money. In an attempt to demonstrate that I was a dedicated mother, I told him that the departure of my husband and father of my children was unexpected and unplanned for a stay at home mother and I have given everything I could to my children's benefit rather than exposing myself to world travel. He also knows that my youngest child has another year at Temple University and that I depend on the tuition remission.  
 >  
 > I do not want to take anymore of your time nor do I want to re-visit the events from which I am already distraught. I just want to know where the "buck stops." I am a Quaker and I just want someone to assist me to mediate a personnel problem to find a mutually acceptable solution rather than another adversarial relationship within the university.  
 >  
 > Most sincerely,  
 > Ruth  
 > Ruth V. Briggs  
 > Executive Assistant  
 > Department of Computer and Information Science College of Science and Technology Temple University Wachman Hall, 3rd Floor

Temple University Mail ~ Re: Confidential Communication

6/20/14 1:23 PM

> 1805 N. Broad Street (038-24)  
 > Philadelphia, PA 19122  
 > 215-204-8659 - Direct line  
 > 215-204-8450 Department line  
 >  
 >  
 >  
 > On Sun, Feb 10, 2013 at 8:28 AM, Cameron Etezady <etezady@temple.edu> wrote:  
 >>  
 >> Hi Ruth.  
 >>  
 >> Thank you for trusting me and contacting me with what I am sure is a very difficult matter.  
 >>  
 >> I am happy to speak with you but while I will keep our conversation confidential, I cannot promise anonymity in the event you raise something that I must investigate further. My obligation is to ensure the university complies with applicable law. I want to assure you, however, that Temple does not tolerate retaliation.  
 >>  
 >> Unfortunately, I will be attending a trial for most of next week and I am out 2.18 so I have extremely limited time unless you wanted to talk by phone after regular work hours.  
 >>  
 >> I would also recommend you speak with sandy foehl or Tracey Hamilton in EOC. They are fantastic and can help guide you through your options.  
 >>  
 >> Again, thank you for reaching out,  
 >>  
 >> Cameron  
 >> Office: 215-204-6542  
 >>  
 >> Sent from my iPhone.  
 >>  
 >> On Feb 9, 2013, at 2:37 PM, "Ruth V. Briggs" <rbriggs@temple.edu> wrote:  
 >>  
 >> Dear Mr. Etezady,  
 >>  
 >> I am contacting you to request a CONFIDENTIAL conversation to discuss disparate treatment for me, which I believe is related to my age of 58.  
 >>  
 >> I am concerned about retaliation. If you are unable to guarantee confidentiality, please say so in your reply.  
 >>  
 >> Sincerely,  
 >>  
 >> Ruth  
 >>  
 >> Ruth V. Briggs  
 >> Executive Assistant  
 >> Department of Computer and Information Science College of Science and  
 >> Technology Temple University Wachman Hall, 3rd Floor  
 >> 1805 N. Broad Street (038-24)  
 >> Philadelphia, PA 19122  
 >> 215-204-8659 - Direct line  
 >> 215-204-8450 Department line  
 >>

# **EXHIBIT 18**

Message

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**From:** Ruth V. Briggs [rbriggs@temple.edu]  
**Sent:** 4/8/2013 10:29:35 PM  
**To:** Deidre Walton [Deidre.Walton@temple.edu]  
**Subject:** Request to discuss my recent disciplinary action

Dear Deidre,

I did not plan to contact you regarding my recent suspension without pay. I requested to review my personnel to read Eugene Kwatny's email regarding the incident because I was denied access to his allegations on the day I was suspended. I was surprised by the severity of the discipline. After reading his email, his failure to mention numerous mitigating factors that contributed to the error I made. When I discovered my oversight, I immediately approached Dr. Kwatny, Dr. Wu and Andrew DiMeo individually and took ownership of my error, for which I expected a verbal discipline. The complaint from Dr. Kwatny does not mention that the other front office staff member was absent for long periods of time for a personal health problem, for which she had FMLA since before the holiday. Since January, she needed to return to her mother's home in North Carolina for a week or more at time because of her mother's deteriorating health and most recently, her funeral. The error I made was not the result of negligence, nor carelessness. While I admit responsibility for dropping the ball on an assignment, I was working on several projects during this time, all of which required shifting priorities. During the week of the incident, Dr. Wu told me that he needed me to drop everything for a workshop that he and another professor were organizing with the help of a student worker. Until the week before the workshop, I was not involved and knew very little about it. My involvement in this project started a week before it was scheduled and I worked 10 or more hours a day that week.

I am responsible for this error, but not because I was negligent nor careless. The insinuation is far from the truth. In fact, I took on additional responsibilities to demonstrate my concern for my colleague and for the department. While I do feel horrible for my error, Dr. Kwatny's insisting that staff and faculty mistakes are unacceptable smacks of hypocrisy. I am the only person for whom he finds mistakes unacceptable. Negligence, carelessness and poor job performance is not uncommon in the department. There are different standards for performance and productivity, which are not justified.

The punishment does not fit the crime and will leave a terrible legacy on my service to the university at the age of 58. I am defending my honor.

Is iTotWiB., Thwal Thly an

I  
my  
my

you

, andn

*Ruth V. Briggs  
Department of Computer and Information Science  
Temple University  
215-204-8659 - Direct line  
215-204-8450 Department line*

# **EXHIBIT 19**

PLEASE PRINT WHERE POSSIBLE AND PRESS HARD IF WRITING. RECEIVED

Temple University

MAR 31 2014

## Disciplinary Report

HUMAN RESOURCES  
EMPLOYEE RELATIONS

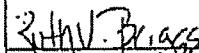
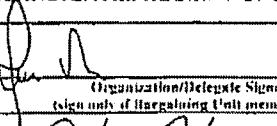
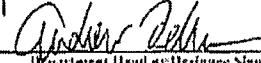
Department CIS	Date 01/20/2014
Employee's Name Ruth Briggs	Title Executive Assistant
TUID 908672981	
Immediate Supervisor Jie Wu	Title Professor & Chair

Check disciplinary action taken. If prior disciplinary action had been given in the same category of the work rule violation, indicate the date(s) action was taken.

General Counseling <input type="checkbox"/>	Final Written Warning <input type="checkbox"/>
Date(s) of Action:	Date(s) of Action:
Verbal Counseling <input type="checkbox"/>	3 Day Suspension w/o Pay <input type="checkbox"/>
Date(s) of Action:	Date(s) of Action:
Written Warning <input checked="" type="checkbox"/>	Termination <input type="checkbox"/>
Date(s) of Action: 01/20/2014	Date(s) of Action:

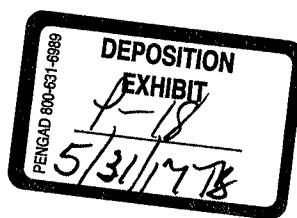
Explanation (Use reverse side if needed):

Violation of work rule B.10
Inefficiency Failing to meet expected standards of performance, productivity or efficiency

Employee's Signature (SIGNING INDICATES RECEIPT ONLY)		Date
		1/21/2014
PRINT Name (Organization/Delegate) Inacted units if bargaining unit position)	Organization/Delegate Signature (Signature of Bargaining Unit member)	Date
Andrew D. Meier		1/21/14
PRINT Name (Department Head or Designee)	Department Head or Designee Signature	Date

Distribution: (Original to: Employee - Copies to: Supervisor, Human Resources/Employee Relations\*, Union (if union employee))  
\* Only disciplines at the level of written warning or above must be sent to Human Resources and Employee Relations.

Revised 07/25/2011



CONFIDENTIAL

TEMPLE0170

# **EXHIBIT 20**

## Message

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**From:** Ruth V. Briggs [rbriggs@temple.edu]  
**Sent:** 2/22/2014 1:25:32 AM  
**To:** Deidre Walton [Deirdre.Walton@temple.edu]  
**Subject:** Providing supporting documentation in my defense  
**Attachments:** JanFebCalendar\_RuthforHR.pdf

Deidre,

I am asking you to review the attached calendars for January and February to defend myself from Drew DiMeo's and Greg Wacker's undocumented and unsubstantiated accusations, for which I received a second serious discipline. The disciplinary action form listed a generic level B violation for failing to carry out basic functions of my job, which you accepted from Greg Wacker at face value even though he is known throughout the college for being less than honest and fair in his "leadership." Is it the university's policy to allow persons in positions of power to retaliate and bully the rank and file staff without the opportunity to provide a statement of events and facts? I have only my experience with disciplinary actions as a frame of reference, for which no one sought a response from me.

I created this calendar to illustrate that there is no intention on my part to interrupt the regularity of the meetings and a level of hypocrisy that is demonstrated by adults in positions of leadership who practice an outdated and ineffective management style: "do as I say and not as I do."

There were a number of times that Dr. Wu cancelled or postponed our regularly scheduled meetings (8:45 am on Mondays, Wednesdays and Fridays) with very little notice and Drew did not attend 2 meetings and was late today. Two scheduled meetings were cancelled because the university closed for snow emergencies, one of which I had to work because Dr. Wu, two speakers from China and his students commuted to campus to work. I don't know if I had the right to refuse but this was the day after I received this disciplinary action and was AFRAID of him. I do not have a record of the day that I was 5 minutes late but I admit to being tardy. On one day, I truly overslept and missed the meeting and reported the four hours to our time keeper even though I worked until 9:00 pm that evening. There were two sick days and two previously scheduled personal days. The scheduled personal day I took last Friday was requested so that I could volunteer at the CRC's Surplus Office Supply Swap to help Jonathan's student worker, Emily, to re-configure and organize the shelving in the room and stock the shelves with surplus supplies. That day, I was made aware of a problem with one of our faculty member's case for promotion and tenure and called Dr. Wu after I was finished at the CRC to offer my help and he accepted my offer of last Friday when I worked 4.5 hours without compensation.

I want you to understand how distressing it is when I have no one in the department and no one in human resources who will listen to me. I am honest and operate with integrity in every arena of my life and five days out of the week I am battered emotionally, insulted, ignored, yelled at in front of peers and the department scapegoat. I am often accused for the mistakes and the

misconduct of others. And there is not shortage of misconduct around here. It is the irony of my life to be the "identified patient" in an environment that is beyond hostile. I am appealing to you to assign someone who is fair and unbiased to conduct an investigation for the truth about these two incidences without prejudice in a timely manner.

Ruth

*Ruth V. Briggs  
Temple University*

*Department of Computer and Information Science  
1805 N Broad Street (038-24)*

*Wachman Hall, Room 324  
Philadelphia, PA 19122  
215-204-8659 - Direct line  
215-204-8450 Department line*

# January 2014

Sun	Mon	Tue	Wed	Thu	Fri	Sat
		1	2	3 Drew out of office Dr. Vu and I met	4	
5 Dr. Vu cancelled meeting	6	7	8 Meeting held all attended	9	10 Scheduled personal day—Ruth Briggs	11
12	13 Meeting held all attended	14	15 Ruth our sick	16	17 Dr. Vu cancelled Meeting for a fire extinguishing	18
19	20 Ruth overslept and time was noon	21	22 Temple closed for snow— <u>Ruth</u> <u>worked at Jie</u> <u>Wu's request</u>	23	24 Meeting held all attended	25
26 Meeting held all attended	27	28 Ruth's day off— <u>Ruth</u> <u>met with Dr. Vu</u>	29	30	31 Meeting held all attended	

# February 2014

Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5 Temple closed for snow—no meeting	6	7 Meeting held all attended	8
9	10	11	12 Meeting held all attended	13	14 Ruth scheduled Macrae to interview the CRC regarding a motion for compensation	15
16	17	18	19	20	21 Meeting held Judy out— Drew 5-10 minutes late, arrived after I was asked to make coffee	22
23	24	25	26	27	28	

# **EXHIBIT 21**

Message

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**From:** Deirdre L Culbreath-Walton [/O=TEMPLE UNIVERSITY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DLWALTON]  
**Sent:** 3/28/2014 4:06:27 PM  
**To:** Sharita Brown [sharb@temple.edu]  
**Subject:** FW: URGENT: PLEASE CONTACT ME ON MONDAY

FYI

**From:** Deirdre L Culbreath-Walton  
**Sent:** Tuesday, March 25, 2014 9:40 AM  
**To:** Ruth V. Briggs  
**Subject:** Re: URGENT: PLEASE CONTACT ME ON MONDAY

Good Morning Ruth

Every time you have reached out to me I have talked with you and looked into your complaints and concerns. I will agree, not always timely for you because of other responsibilities and scheduled obligations. I did not ask you to lie about being discipline but offered you the ability to bid out by letting the Generalist know to not reject your application because of the discipline.

You told me that you reached out to Sandra Foehl for help and did not hear from her. I talked with Sandra and she replied to you and offered her services to you several weeks ago and you have not replied back to her.

I did not contact Greg or Drew but they did call me concerning your Friday meeting and Dr.Wu expense report. Greg and Drew gave me the facts of the situation.

If you would like to discuss further or dispute any of my facts please contact me at 7-2296.

Sincerely

Deirdre

Sent from my iPhone

On Mar 25, 2014, at 9:15 AM, "Ruth V. Briggs" <[rbriggs@temple.edu](mailto:rbriggs@temple.edu)> wrote:

Deidre,

I do not know how to respond to this email. I am drowning here and have reached out to you numerous times and waited and waited. This is affecting the quality of my work life and my person life. All I want is to continue to work without being harassed. Based on the content of your email, I assume that you contacted Drew, Greg and Dr. Wu when I asked that you refrain from doing so because I know that the harassment will escalate without the protection of human resources.

The story that you are telling me about my discipline is the third story I have been told. Drew said that I did not call in and you believe him. I have not idea what Greg said other than what Drew told me and he wanted me fired and you told me that I had not called in or followed procedures. We have no written procedures and I did call in and rushed to work rather than said another 5 minutes to start my computer to send an email stating the same thing I told Taylor.

I was held to a unequal standard and I am suffering the consequences because I cannot bid out on another job. I was told by you to that I could bid on a job without stating that I have been disciplined and I will not lie on an application.

I will not retract the comments I made because I believe the to be true. Faculty and staff members tell me frequently that they feel bad about the matter with which I am treated and diminished in public.

I have nothing more to say.

Ruth

*Ruth V. Briggs*

*Temple University*

*Department of Computer and Information Science  
1805 N Broad Street (038-24)*

*Wachman Hall, Room 324  
Philadelphia, PA 19122  
215-204-8659 - Direct line  
215-204-8450 Department line*

On Mon, Mar 24, 2014 at 5:30 PM, Deirdre L Culbreath-Walton <[DLWalton@temple.edu](mailto:DLWalton@temple.edu)> wrote:

Hi Ruth

You have made some serious accusations against Dr. Wu, Drew and Greg. You are accusing them of fabricating records and information and lying to make you look bad. I am going to address your issues in the order you have laid them out. Your meeting with Dr. Wu and Drew are in Dr. Wu's office and they are not in public places. Because you and Dr. Wu have had problems communicating in the past and you do not have the best work relationship, Drew does attend these meetings to assist both you and Dr. Wu. Drew does not attend to take sides but mediate the conversation between you and Dr. Wu.

The disciplined that you received was because you were late and did not come into the office until mid-day. No notification was received from you until mid-day and you talked with a student, not your supervisor, Dr. Wu nor any other Administrator or Regular employee. You also did not send an email to Dr. Wu to notify him of your lateness once you knew he was not available by phone. Because you did not follow proper call out procedures Dr. Wu asked for you to be disciplined. This discipline is not a false report unless any of the facts I stated above are incorrect.

Regarding the expense report in CONCUR and the update of the FOPAL, Account Payable has confirmed that Dr. Wu's FOAPAL in question was added to concur Monday , March 17, 2014 in the nightly update and was available for you to use. You are accusing Drew of lying about doing his job when Account Payable has confirmed that he updated the FOPAL.

Lastly, you are Dr. Wu's Assistant and you get paid for handling his things. If you are not happy with your responsibilities then we may need to review exactly what you do every day and make changes. Ultimately, this may not be a good fit for you and you may need to explore work option that are more satisfying to you.

If the facts as I have stated here are incorrect please let me know and I will look into your concerns further. Also if you would like help identifying other positions please give me a call or reply to my email.

Deirdre

**From:** Ruth V. Briggs [mailto:[rbriggs@temple.edu](mailto:rbriggs@temple.edu)]  
**Sent:** Sunday, March 23, 2014 11:35 PM  
**To:** Deidre Walton  
**Subject:** URGENT: PLEASE CONTACT ME ON MONDAY

CONFIDENTIAL COMMUNICATION. DO NOT SHARE WITH GREG WACKER, DREW DI MEO NOR JIE WU

Dear Deidre,

My work situation with Drew DiMeo and Dr. Wu is escalating and I need your help. This issue is not just something that affects my work week, but is causing anxiety and depression throughout my weekends. To mask this from my grown children and grandchildren, I report that I have the flu so that they stay away.

I am actually afraid to go to work, especially Mondays, Wednesdays and Fridays, when I meet with Drew and Dr. Wu. Before I go to sleep and as soon as I wake, the anxiety I experience is palpable and impacting the quality of my personal life. As the only staff member required to meet with Dr. Wu and Drew, I would think that my "superiors" would behave as professionals by respecting my privacy. In fact, the meetings occur within the earshot of my co-workers and visitors (students, external constituents, faculty). The fact that I am singled out and verbally assaulted in an open public area has been the "gristmill" for gossip and rumors, which have been reported back to me from employees in other departments. Dr. Wu said that Drew is there for protection and as a witness but I have no protection and feel like an abuse victim. GREG WACKER HAS NEVER BEEN PRESENT FOR ONE MEETING but still recommended termination for me, for what was reported to me by Drew when he gave me the discipline form for "lateness." The first time I reached out to HR, I learned that I was disciplined for using tardiness for intentionally avoiding these meetings. The next time we spoke, you told me that it was because I failed to report that I would be late. The truth is that I overslept, called the office and reported this to Taylor Lentz, who told Dr. Wu but chose to follow through with the discipline when he knew that I had called. Apparently, they are immune to discipline for what I find intolerable, filing a falsified discipline report against me. Apparently, the word of three bullies carries more weight than the truth.

I talked to Taylor Lentz, the student worker who you were going to call to confirm that I called the morning I overslept last week to ask if you had her after spring break. When she inquired why you needed to talk to her, I told her that you wanted to confirm that I called to report the morning I overslept. She said that she did not know where Judy Lennon had gone (she disappears on a daily basis and gives no explanation) so she personally went into Dr. Wu's office and told him that I had called, overslept and was on my way in. This means that he endorsed the disciplinary actions against me even after he had been given my message. I hope you can understand why it feels like there is a concerted effort to get rid of me.

There was another incident on Friday when Drew made an accusation that I had provided evidence for my defense that was manufactured afterward rather than admit the truth. Knowing that Drew had lied about the day I overslept and suffered no consequences for lying did not contribute to my confidence in defending my integrity when I was in the presence of two bullies. I offered to log into the travel reimbursement system, Concur, because Drew suggested

that I had manufactured the screen shot I produced from the night before. I only wanted to defend myself against another lie. When I saw the cost centers that were missing the day before on the screen, I was in a state of disbelief because I knew that Drew chose to cast doubt on my character rather than admitting that he had not added Dr. Wu's new grant numbers as Dr. Wu requested last week. I did not leave the office until after 9:00, using the tutorials in Concur, so that I could allocate travel expenses to the grant for Dr. Wu. My access level was limited and I could only request access to the new grant FOAPALs, so my screenshot listed the new grant numbers as "Access pending." If the numbers were pending at 9:00 the night before and were available the following morning, they were added after the screen shot taken.

I do not want to spend anymore personal time about job related matters on my personal time, but I want to discuss changes made to my job description and responsibilities that have been given to Hailey King, Jackie Harriz's replacement. My essential functions have been diminished to elementary clerical functions. I am performing entry level data entry tasks, while one student worker and Haley King are performing the functions of my job description. The essential functions that were performed by our former business manager, Alex Grinshpun and were taken over by Drew are assigned to me with more and more frequency. Performing accounting functions are not in my area of expertise and not an essential function for my position. I am a team player but I object to performing the department secretary's job, or being summoned from the 10th floor to the 3rd floor to make coffee and bring cookies to Dr. Wu and his guests when Judy and a student worker are available in the front office. It appears to be another strategy to diminish me, discount my experience and talents in an effort to get my resignation or termination.

You can reach me on my cell phone (484-557-6234) or work land line (215-204-8659).

*Ruth V. Briggs  
Temple University*

*Department of Computer and Information Science  
1805 N Broad Street (038-24)*

*Wachman Hall, Room 324  
Philadelphia, PA 19122  
215-204-8659 - Direct line  
215-204-8450 Department line*

# **EXHIBIT 22**

Message

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**From:** Sandra A. Foehl [SFoehl@temple.edu]  
**Sent:** 2/26/2014 9:34:51 AM  
**To:** Deirdre L Culbreath-Walton [DLWalton@temple.edu]; Tracey Hamilton [HamiltonT@temple.edu]  
**Subject:** FW: I want to schedule an appointment to file a complaint

Latest from Ruth Briggs. Deirdre, have you talked with her recently to know what her issues are? Sandy

**From:** Ruth V. Briggs [mailto:rbriggs@temple.edu]  
**Sent:** Tuesday, February 25, 2014 10:51 PM  
**To:** Sandra A. Foehl  
**Subject:** I want to schedule an appointment to file a complaint

Dear Sandy,

I have tried desperately to make my work situation tolerable, while my family and friends say that I need to take a pro-active defense against my supervisor and two managers in the Dean's Office. But I have reached my breaking point and need to be concerned with repairing my professional reputation. On numerous occasions, I have spoken to Deirdre Walton who has not been helpful or timely at all. I plan to file an EEOC complaint internally and have already had a phone intake with the EEOC.

Please let me know when we can meet.

Thank you, Ruth

*Ruth V. Briggs*

*Temple University*

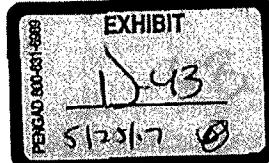
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# **EXHIBIT 23**

Temple University Mail - Re: My recent disciplinary action



Ruth V. Briggs &lt;rbriggs@temple.edu&gt;

**Re: My recent disciplinary action**

1 message

Deirdre L Culbreath-Walton <DLWalton@temple.edu>  
 To: "Ruth V. Briggs" <rbriggs@temple.edu>

Fri, Mar 14, 2014 at 10:40 AM

Hi Ruth

Thanks for getting back to me. I had a meeting at 9:00 and I am available now. If you are tied up I understand. I hoped we could talk with Drew and clarify some of your concerns. Please reply back to me if you have availability this morning.

Thanks

Deirdre

Sent from my iPhone

On Mar 13, 2014, at 9:39 PM, "Ruth V. Briggs" <rbriggs@temple.edu> wrote:

Dear Deidre,

We have a visitor tomorrow to speak in our "Distinguished Lecture Series." The event begins at 11:00 am, for which I need to start setting up around 10:00 am in Barton Hall. I can meet sometime between 9 to 10. If that is acceptable to you, please let me know.

Ruth

*Ruth V. Briggs  
 Temple University  
 Department of Computer and Information Science  
 1805 N Broad Street (038-24)  
 Wachman Hall, Room 324  
 Philadelphia, PA 19122  
 215-204-8659 - Direct line  
 215-204-8450 Department line*

On Thu, Mar 13, 2014 at 5:49 PM, Deirdre L Culbreath-Walton <DLWalton@temple.edu> wrote:

Hi Ruth

Am I available tomorrow morning to meet. I have a meeting on main campus at 9:00 if you have time please let me know.

Temple University Mail - Re: My recent disciplinary action

6/20/14 1:31 PM

Thanks

Deirdre

**From:** Ruth V. Briggs [mailto:rbriggs@temple.edu]  
**Sent:** Thursday, March 13, 2014 1:38 AM  
**To:** Deidre Walton  
**Subject:** My recent disciplinary action

Hi Deidre,

When we last spoke, I challenged Greg Wacker's assertion that I failed to notify the department that I had overslept and would be in within the hour. I would think that you would take Greg's false allegation as a serious violation of employee conduct enough to look into the matter in a timely fashion. Clearly, issues of "fairness" are of no concern to you but I am hopeful that the falsification of employee records is an issue of concern to you.

I want to settle this matter internally with the HR department regarding my request to rescind this discipline simply because Greg Wacker lied in his statement to you about me. But this is contingent upon your good faith effort to investigate this issue. I have been disciplined twice in the 14 years I have been at Temple, for which I was not given the opportunity to defend myself against half-truths and bold faced lies. It appears as staff members in managerial positions are free to practice authoritarian leadership over inferiors because they are not accountable to the Rules of Conduct. "Do as I say and not as I do" is a poor style of management that depletes employee morale. I know that my productivity is affected, which I attribute to feeling a total lack of control because my livelihood and integrity feel scrutinized and diminished.

Please show me the same respect that you give to the person who has had a grudge against me for many years. In the eyes of the law, this could be viewed as unfair labor practices and discrimination, both of which violate federal and state laws.

I always have wait for you to get back to me because it is not your priority. Two weeks ago, I sent Sandy Foehl an email, in which I requested her help. She, too, is ignoring me. I am saddened, angry and worried because I cannot get help internally. Is it necessary to file a legal complaint to remedy this situation? I think that you, Greg Wacker, Drew DiMeo and Jie Wu have no regard for my service to the university, our students, faculty, staff and external constituents and subscribe to the double standard. I

Temple University Mail - Re: My recent disciplinary action

6/20/14 1:31 PM

I hope that this is not the case but it is difficult to assess in a vacuum.

Respectfully, Ruth

*Ruth V. Briggs*

*Temple University*

*Department of Computer and Information Science*

*1805 N Broad Street (038-24)*

*Wachman Hall, Room 324*

*Philadelphia, PA 19122*

*215-204-8659 - Direct line*

*215-204-8450 Department line*

# **EXHIBIT 24**

Message

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**From:** Deirdre L Culbreath-Walton [/O=TEMPLE UNIVERSITY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DLWALTON]  
**Sent:** 3/28/2014 4:06:27 PM  
**To:** Sharlita Brown [sharb@temple.edu]  
**Subject:** FW: URGENT: PLEASE CONTACT ME ON MONDAY

FYI

**From:** Deirdre L Culbreath-Walton  
**Sent:** Tuesday, March 25, 2014 9:40 AM  
**To:** Ruth V. Briggs  
**Subject:** Re: URGENT: PLEASE CONTACT ME ON MONDAY

Good Morning Ruth

Every time you have reached out to me I have talked with you and looked into your complaints and concerns. I will agree, not always timely for you because of other responsibilities and scheduled obligations. I did not ask you to lie about being discipline but offered you the ability to bid out by letting the Generalist know to not reject your application because of the discipline.

You told me that you reached out to Sandra Foehl for help and did not hear from her. I talked with Sandra and she replied to you and offered her services to you several weeks ago and you have not replied back to her.

I did not contact Greg or Drew but they did call me concerning your Friday meeting and Dr.Wu expense report. Greg and Drew gave me the facts of the situation.

If you would like to discuss further or dispute any of my facts please contact me at 7-2296.

Sincerely

Deirdre

Sent from my iPhone

On Mar 25, 2014, at 9:15 AM, "Ruth V. Briggs" <[rbriggs@temple.edu](mailto:rbriggs@temple.edu)> wrote:  
Deidre,

I do not know how to respond to this email. I am drowning here and have reached out to you numerous times and waited and waited. This is affecting the quality of my work life and my person life. All I want is to continue to work without being harassed. Based on the content of your email, I assume that you contacted Drew, Greg and Dr. Wu when I asked that you refrain from doing so because I know that the harassment will escalate without the protection of human resources.

The story that you are telling me about my discipline is the third story I have been told. Drew said that I did not call in and you believe him. I have not idea what Greg said other than what Drew told me and he wanted me fired and you told me that I had not called in or followed procedures. We have no written procedures and I did call in and rushed to work rather than said another 5 minutes to start my computer to send an email stating the same thing I told Taylor.

I was held to a unequal standard and I am suffering the consequences because I cannot bid out on another job. I was told by you to that I could bid on a job without stating that I have been disciplined and I will not lie on an application.

I will not retract the comments I made because I believe the to be true. Faculty and staff members tell me frequently that they feel bad about the matter with which I am treated and diminished in public.

I have nothing more to say.

Ruth

*Ruth V. Briggs*

*Temple University*

*Department of Computer and Information Science  
1805 N Broad Street (038-24)*

*Wachman Hall, Room 324  
Philadelphia, PA 19122  
215-204-8659 - Direct line  
215-204-8450 Department line*

On Mon, Mar 24, 2014 at 5:30 PM, Deirdre L Culbreath-Walton <[DLWalton@temple.edu](mailto:DLWalton@temple.edu)> wrote:

Hi Ruth

You have made some serious accusations against Dr. Wu, Drew and Greg. You are accusing them of fabricating records and information and lying to make you look bad. I am going to address your issues in the order you have laid them out. Your meeting with Dr. Wu and Drew are in Dr. Wu's office and they are not in public places. Because you and Dr. Wu have had problems communicating in the past and you do not have the best work relationship, Drew does attend these meetings to assist both you and Dr. Wu. Drew does not attend to take sides but mediate the conversation between you and Dr. Wu.

The disciplined that you received was because you were late and did not come into the office until mid-day. No notification was received from you until mid-day and you talked with a student, not your supervisor, Dr. Wu nor any other Administrator or Regular employee. You also did not send an email to Dr. Wu to notify him of your lateness once you knew he was not available by phone. Because you did not follow proper call out procedures Dr. Wu asked for you to be disciplined. This discipline is not a false report unless any of the facts I stated above are incorrect.

Regarding the expense report in CONCUR and the update of the FOPAL, Account Payable has confirmed that Dr. Wu's FOAPAL in question was added to concur Monday , March 17, 2014 in the nightly update and was available for you to use. You are accusing Drew of lying about doing his job when Account Payable has confirmed that he updated the FOPAL.

Lastly, you are Dr. Wu's Assistant and you get paid for handling his things. If you are not happy with your responsibilities then we may need to review exactly what you do every day and make changes. Ultimately, this may not be a good fit for you and you may need to explore work option that are more satisfying to you.

If the facts as I have stated here are incorrect please let me know and I will look into your concerns further. Also if you would like help identifying other positions please give me a call or reply to my email.

Deirdre

**From:** Ruth V. Briggs [mailto:[rbriggs@temple.edu](mailto:rbriggs@temple.edu)]  
**Sent:** Sunday, March 23, 2014 11:35 PM  
**To:** Deidre Walton  
**Subject:** URGENT: PLEASE CONTACT ME ON MONDAY

CONFIDENTIAL COMMUNICATION. DO NOT SHARE WITH GREG WACKER, DREW DI MEO NOR JIE WU

Dear Deldre,

My work situation with Drew DiMeo and Dr. Wu is escalating and I need your help. This issue is not just something that affects my work week, but is causing anxiety and depression throughout my weekends. To mask this from my grown children and grandchildren, I report that I have the flu so that they stay away.

I am actually afraid to go to work, especially Mondays, Wednesdays and Fridays, when I meet with Drew and Dr. Wu. Before I go to sleep and as soon as I wake, the anxiety I experience is palpable and impacting the quality of my personal life. As the only staff member required to meet with Dr. Wu and Drew, I would think that my "superiors" would behave as professionals by respecting my privacy. In fact, the meetings occur within the earshot of my co-workers and visitors (students, external constituents, faculty). The fact that I am singled out and verbally assaulted in an open public area has been the "gristmill" for gossip and rumors, which have been reported back to me from employees in other departments. Dr. Wu said that Drew is there for protection and as a witness but I have no protection and feel like an abuse victim. GREG WACKER HAS NEVER BEEN PRESENT FOR ONE MEETING but still recommended termination for me, for what was reported to me by Drew when he gave me the discipline form for "lateness." The first time I reached out to HR, I learned that I was disciplined for using tardiness for intentionally avoiding these meetings. The next time we spoke, you told me that it was because I failed to report that I would be late. The truth is that I overslept, called the office and reported this to Taylor Lentz, who told Dr. Wu but chose to follow through with the discipline when he knew that I had called. Apparently, they are immune to discipline for what I find intolerable, filing a falsified discipline report against me. Apparently, the word of three bullies carries more weight than the truth.

I talked to Taylor Lentz, the student worker who you were going to call to confirm that I called the morning I overslept last week to ask if you had her after spring break. When she inquired why you needed to talk to her, I told her that you wanted to confirm that I called to report the morning I overslept. She said that she did not know where Judy Lennon had gone (she disappears on a daily basis and gives no explanation) so she personally went into Dr. Wu's office and told him that I had called, overslept and was on my way in. This means that he endorsed the disciplinary actions against me even after he had been given my message. I hope you can understand why it feels like there is a concerted effort to get rid of me.

There was another incident on Friday when Drew made an accusation that I had provided evidence for my defense that was manufactured afterward rather than admit the truth. Knowing that Drew had lied about the day I overslept and suffered no consequences for lying did not contribute to my confidence in defending my integrity when I was in the presence of two bullies. I offered to log into the travel reimbursement system, Concur, because Drew suggested

that I had manufactured the screen shot I produced from the night before. I only wanted to defend myself against another lie. When I saw the cost centers that were missing the day before on the screen, I was in a state of disbelief because I knew that Drew chose to cast doubt on my character rather than admitting that he had not added Dr. Wu's new grant numbers as Dr. Wu requested last week. I did not leave the office until after 9:00, using the tutorials in Concur, so that I could allocate travel expenses to the grant for Dr. Wu. My access level was limited and I could only request access to the new grant FOAPALs, so my screenshot listed the new grant numbers as "Access pending." If the numbers were pending at 9:00 the night before and were available the following morning, they were added after the screen shot taken.

I do not want to spend anymore personal time about job related matters on my personal time, but I want to discuss changes made to my job description and responsibilities that have been given to Hailey King, Jackie Harriz's replacement. My essential functions have been diminished to elementary clerical functions. I am performing entry level data entry tasks, while one student worker and Haley King are performing the functions of my job description. The essential functions that were performed by our former business manager, Alex Grinshpun and were taken over by Drew are assigned to me with more and more frequency. Performing accounting functions are not in my area of expertise and not an essential function for my position. I am a team player but I object to performing the department secretary's job, or being summoned from the 10th floor to the 3rd floor to make coffee and bring cookies to Dr. Wu and his guests when Judy and a student worker are available in the front office. It appears to be another strategy to diminish me, discount my experience and talents in an effort to get my resignation or termination.

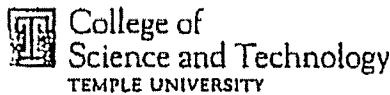
You can reach me on my cell phone (484-557-6234) or work land line (215-204-8659).

*Ruth V. Briggs  
Temple University*

*Department of Computer and Information Science  
1805 N Broad Street (038-24)*

*Wachman Hall, Room 324  
Philadelphia, PA 19122  
215-204-8659 - Direct line  
215-204-8450 Department line*

# **EXHIBIT 25**



Office of the Dean  
Cornell Hall, Suite 400  
1803 N Broad Street, (041-01)  
Philadelphia, PA 19122 6095

phone 215-204-2888  
fax 215-204-1255  
e-mail [cst@temple.edu](mailto:cst@temple.edu)  
web [www.temple.edu/cst](http://www.temple.edu/cst)

April 1, 2014

Ruth Briggs,

Over the last week, we have investigated two work related items that were brought to the Dean's Office attention. Specifically,

- On March 20<sup>th</sup>, 2014 at 3:56pm you were instructed to complete a concur travel expense reimbursement for Dr. Wu by the end of the workday. At 5:30pm you contacted Drew and indicated that the FOAPAL was still not available in Concur. Drew confirmed the FOAPAL was available. You failed to complete the task as requested. On Friday, March 21<sup>st</sup>, you met with Dr. Wu and Drew as scheduled. During this meeting you became argumentative and unprofessional. You insisted that Drew and Dr. Wu were calling you a liar.
- You were directed to book a room reservation for colloquium speaker Dr. Ness Shroff for his upcoming visit to Temple University on Thursday, March 13<sup>th</sup> and 14<sup>th</sup>, 2014. You booked a reservation at the Conwell Inn however; it was booked for the wrong dates. On the day of his visit, at the last minute you were able to secure a room at the Doubletree in Center City.

In accordance with Temple University Rules of Conduct – Revised Fall 2012, you are in violation of the following work rules:

*C.4 Negligence/Carelessness*

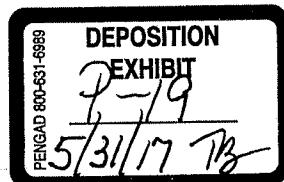
- a) Neglecting job duties or responsibilities, or failing to carry out instructions given by supervisor.

*C.3 Disruptive or Disorderly Conduct*

- a) Engaging in any unruly, erratic or undisciplined behavior that disrupts or may disrupt the workplace.
- b) Engaging in any course of conduct that does or may undermine or interfere with supervision.

These infractions occurred despite previous counseling's and written warnings, issued 3/26/2013 and 1/20/2014. The disciplinary action for a 2<sup>nd</sup> violation of category C rules of conduct is termination. Effective the end of the day today, your employment at Temple University is being terminated.

Sincerely,  
  
Greg Wacker



CONFIDENTIAL

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